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Attorneys for Defendant, Rager, Bell, Doskocil, and Meyer
and Brad Doskocil, CPA, appearing specially

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

DECLARATION OF STEPHANIE SESSIONS PERKINS

I, STEPHANIE SESSIONS PERKINS, declare:

1. I am Senior Counsel with law firm of Chapman, Glucksman & Dean, attorneys of record for specially appearing defendants RBDM Rager Meyer Accountancy Corp. ("RBDM") and Brad Doskocil, CPA (RBDM and Brad Doskocil are herein collectively referred to as "Defendants").

1 If called upon to testify, I could and would competently testify to the following under oath.

2 2. Defendant RBDM was served with the Summons and Complaint in this matter on or
3 about October 4, 2007 and its response is due pursuant to Stipulation and Order by November 9, 2007.

4 3. Defendant Brad Doskocil, CPA was served with the Summons and Complaint in this
5 matter on or about October 5, 2007 and his response is due pursuant to Stipulation and Order by
6 November 9, 2007.

7 4. Counsel for Defendants and Plaintiff, Steven Nerayoff ("Plaintiff"), are currently
8 working towards non-judicial resolution of issues relative to venue and a potential tolling agreement
9 pending the outcome of Plaintiff's dispute pending in the United States Tax Court and/or with the
10 Internal Revenue Service out of which these matters arise. Counsel for Defendants and Plaintiff, are
11 evaluating the judicial efficiency of proceeding with this action, regardless of venue, pending the
12 outcome of the above-referenced United States Tax Court and/or with the Internal Revenue Service
13 matters.

15 3. Further investigation into the facts, circumstances, and issues in this case promotes
16 judicial economy and merits a continuance of 1) the Case Management Conference to December 19,
17 2007; 2) the filing of the Joint Case Management Statement to December 9, 2007; and Defendants'
18 deadline to respond to the Complaint to December 9, 2007.

19 4. I have discussed the scheduling and other issues presented in this Joint Stipulation
20 with Paul E. Rice, counsel for Plaintiff. Counsel for all parties join in this request for a continuance
21 of the Case Management Conference, the deadline to file the Joint Case Management Conference
22 Statement and the deadline for Defendants to respond to the Complaint.

24 5. A previous extension of time to respond to the Complaint was sought in this case and
25 granted affording Defendants until November 9, 2007 to file responsive pleadings. This extension
26 did not afford the parties to this request for an extension of existing deadlines, sufficient time to
27

1 | investigate and resolve certain matters informally, the result of which may reduce the burden to the
2 | court.

3 6. If the order the parties propose is granted, the requested continuance would have the
4 following effect on the schedule for this case:

(a) The date of the Case Management Conference would be continued to December 19, 2007.

12 I declare under the penalty of perjury and the laws of the United States that the foregoing is
13 true and correct and that this declaration was executed in Sacramento, California on this 7 day
14 of November 2007

Stephanie Sessions Perkins, Esq.